

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

LEONARD S. EMBODY,)
Plaintiff,) NO. 3:10-cv-00126
V.) JURY DEMAND
STEVE WARD, individually,) JUDGE HAYNES
Defendant.)

DEFENDANT'S FIRST REQUESTS FOR ADMISSION

REQUEST NO. 1: Admit that on December 20. 2009, the muzzle nut/thread protector of the weapon described in paragraph 3 of the Complaint was colored orange.
True.

REQUEST NO. 2: Admit that on December 20, 2009 you carried a recording device with you at Radnor Lake State Natural Area ("Radnor Lake").
True.

REQUEST NO. 3: Admit that on December 20, 2009, you recorded yourself and other persons while you walked through Radnor Lake.
True.

REQUEST NO. 4: Admit that on December 20, 2009, at the time you walked through Radnor Lake, your attire included a military issue woodland camo jacket.
True.

REQUEST NO. 5: Admit that Steve Ward never handcuffed you on December 20, 2009 at Radnor Lake.

True.

REQUEST NO. 6: Admit that you have commented about the events you are alleging in the Complaint in internet discussion forums under the name "Kwikrnu."

True.

Respectfully submitted,

ROBERT E. COOPER, JR., BPR #010934
Attorney General & Reporter

Mary M. Bers

MARY M. BERS, BPR #013159
Senior Counsel
Civil Rights & Claims Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-1845

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded by U.S. Mail, first-class postage pre-paid, to Phillip L. Davidson, 2400 Crestmoor Road, Suite 107, Nashville, TN 37215 on this 17th day of August, 2010.

Mary M. Bers

MARY M. BERS

Respectfully submitted,

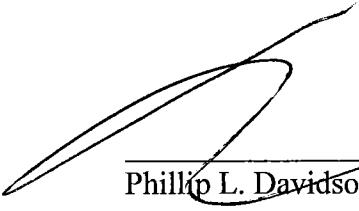
~~Phillip L. Davidson, #6466
2400 Crestmoor Road
Suite 107
Nashville, Tennessee 37215
(615) 386-7115~~

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was delivered by first class mail to

Mary M. Bers
Senior Counsel
Civil Rights & Claims Division
PO Box 20207
Nashville, TN 37202-0207

this the 22 day of April, 2010.


Phillip L. Davidson